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March 7, 2005

**Sent via U.S. Mail**

Eric Johnson  
U.S. Environmental Protection Agency  
Region 8, 8ENF-T  
999 18<sup>th</sup> Street, Suite 300  
Denver, Colorado 80202-2466

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**MAR 11 2005**

**ECEJ-TEP**

RE: Progress report for February 2005 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Mr. Johnson:

Per paragraph 64 of the Order, enclosed is a copy of the February 2005 progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4135 or e-mail at [cgypton@hecla-mining.com](mailto:cgypton@hecla-mining.com).

Sincerely,

Chris Gypton  
Project Manager

Encl

Cc: John Galbavy, Esq. (HMC) (w/o attachments)  
John Jacus, Esq. (DG&S)

U89848  
03-29



March 7, 2005

**MEMORANDUM TO:** Paul Glader

**COPIES TO:** file, distribution

**FROM:** Chris Gypton

**SUBJECT:** **Progress Report No. 10 for period ending February 28, 2005; Pond 2 Final Closure - Apex Site, Washington County, Utah**

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**Summary**

Abnormal precipitation continued intermittently throughout the month of February, but did not materially impact the work.

Site activities in the first week of the month focused on completing the upgrade of the drainage and evaporation systems. The four new evaporation basins were completed, as were the additional drainage piping and sumps. A secondary containment berm was completed around the crest of the tailings impoundment. Activities in the remainder the month focused on seepage collection system management plus intermittent dewatering.

The revised schedule assumes that management of the seepage collection system will be main activity through March 2005, however the dewatering sumps will be pumped out if it appears the conditions to evaporate this water are favorable. The winter wet season typically ends in late March to early April, so we plan to focus more on dewatering starting in April 2005. The water level in the old seepage collection ponds will be kept as low as possible in any case. Based on our observations of the evaporation rate in summer 2004, it is reasonable to set the target start of the final cover construction in late June 2005.

## **Major Issues**

1. None

## **Work Planned for Next Period**

1. Continue management of the existing seepage collection system. Water collected in the system will be periodically pumped back to the impoundment and allowed to evaporate. The inventory of water in the seepage collection system will be kept to a practical minimum.
2. Continue dewatering of the tailings as weather conditions permit.

## **Work in Process**

### ***Procure Outside Services***

1. The formal site maintenance contract, covering both seepage collection and dewatering activities, was issued to Hughes GC on February 22<sup>nd</sup>.

### ***Procure Materials***

1. No activity

### ***Contractor Submittals***

1. No activity

### ***Seepage Collection System Maintenance***

1. Personnel were on site a total of twenty-six days in the month. 25% of this time was for earthwork related activities. Seepage collection system was maintained concurrently.

### ***Miscellaneous Civil Work and Dewatering System Upgrades***

1. The new evaporation basins and additional drainage piping were completed the first week in February.

### ***Phase II Drain/Evaporate Excess Water***

1. This activity was intermittent in February, most of the efforts were focused on managing the seepage collection system and civil works improvements.

## **Sampling and Analysis in Period**

### ***Material Characterization***

1. No activity

*Field Tests, Inspections & QA/QC*

1. No activity

### **Cost and Schedule**

Committed costs in February 2005 were approximately \$54,000. The majority of the expenditures were associated with management of the seepage collection system and replacement of the evaporation cells with larger ones. Total project to date committed is approximately \$462,000. Forecast cost at completion is now expected to be \$1,091,000. The increase in the cost at completion is due to weather related delays and additional site maintenance expenditures in the month of January.

The cost report for February is attached. Current status of the deliverables listed in the RCRA 7003 order is as follows:

<b>Deliverable</b>	<b>Reference Paragraph</b>	<b>Due</b>	<b>Remarks</b>
Post warning signage around perimeter of site	57	<b>15 days after effective date of order</b>	Work completed on March 9, 2004
Begin implementation of closure plan	63	<b>45 days after receipt of filing of order</b>	Work started on February 23, 2004
Monthly progress reports	64	<b>28<sup>th</sup> day after close of month</b>	Requirement in effect after order is filed.
Completion report	65	<b>30 days after completion of all closure plan tasks</b>	To be submitted within 30 days after work has been physically completed and all contracts closed out.

The update of the schedule milestones is on the following table:

<b>Milestone</b>	<b>Target</b>	<b>Actual</b>	<b>Remarks</b>
Issue bid package – Phase I (Sump Drains)	6/14/04	<b>6/15/04</b>	Portion of RFP materials issued at pre-bid on 6/14/04; remainder sent via courier
Issue RFP package – Phase III	6/24/04	<b>6/24/04</b>	
Award contract for Phase I	6/24/04	<b>6/29/04</b>	Date contract was shipped to Hughes
Pre-bid meeting – Phase III	7/19/04	<b>7/19/04</b>	
Start Phase I (Sump Drains) construction	7/12/04	<b>7/19/04</b>	
Start Phase II (Evaporation)	7/19/04	<b>7/29/04</b>	
Receive bids for Phase III	8/2/04	<b>8/2/04</b>	
Re-bid Phase III contract package	April 2005		
Start Phase III construction	June 2005		Revised target based on dewatering progress
Complete Phase III construction	August 2005		Revised target based on late PH III start

## **Supplemental Attachments**

1. None

Apex Site  
Pond 2 Final Closure  
Project Cost Report

Activity	2004 Budget	Revised Budget May 2004	Committed Cost this Period	Cumulative Committed Cost To Date 1-31-05	Forecasted Cost To Complete	Forecasted Final Cost	Remarks on Forecast to Complete
<b>Phase I - Drain Excess Liquid From Tailings</b>							
Test wick program - Nilox		35,000		35,000	0	35,000	
Earthwork during wick test program		2,000		1,768	0	1,768	
Install drainage piping and sumps:							
Contractor mobilization/demobilization		5,500		5,500	0	5,500	
Install sumps - material & labor		20,000		24,500	0	24,500	
Build surface evaporation ponds		2,700		838	0	838	
Remove existing evaporation ponds		2,000		0	0	0	Work moved to Phase III
Bury existing pond material & regrade		2,000		0	0	0	Work moved to Phase III
Survey monuments		3,500		1,160	500	1,660	One trip plus final report
<b>Subtotal Phase I</b>	<b>189,200</b>	<b>72,700</b>		<b>68,768</b>	<b>500</b>	<b>69,268</b>	
<b>Phase II - Evaporate Excess Liquid</b>							
Operate evaporation & pumping system		8,000		9,585		9,585	FY 2004 work only
Test pits to determine dewatering progress				1,320		1,320	
Upgrade evaporation cells & collection sumps			28,300	132,030		132,030	
Dewatering & seepage collection management			13,178	25,330	65,000	90,330	T&M labor + equipment; February '05 through June '05
<b>Subtotal Phase II</b>	<b>6,000</b>	<b>8,000</b>	<b>33,478</b>	<b>168,285</b>	<b>65,000</b>	<b>233,285</b>	
<b>Phase III - Regrading &amp; Final Cover System</b>							
Contractor mobilization/demobilization		20,000		4,428	37,800	42,028	
Excavate existing embankment		15,000		0	46,000	46,000	
Final grading of 1% surface		2,500		0	56,000	56,000	
Place barrier layer (GCL) - top		200,000		0	150,000	150,000	
Place barrier layer (GCL) - outcrops		50,000		0	0	0	Incl w/ GCL cover cost
Excavate diversion channel		9,100		0	37,000	37,000	
Place 12" protection layer on top surface		19,000		0	45,000	45,000	
Reconstruct outside embankment		7,350		0	0	0	Incl w/ excavation of existing embankment
Finish grade 1% surface - top		3,000		0	0	0	Incl w/ 12" protection layer
Place surface layer at outcrops (D50 = 1")		4,800		0	0	0	Incl w/ 12" protection layer
Recontour diversion channel for drainage		2,000		0	0	0	Incl w/ diversion channel exc
Place diversion channel erosion protection (3" rock)		3,800		0	0	0	Incl w/ diversion channel exc
Surveying - diversion channel drainage		2,500		0	0	0	Incl w/ diversion channel exc
Remove existing evaporation ponds		0		0	7,500	7,500	
Clear site for construction		3,000		0	3,000	3,000	
Performance & Payment Bond		0		0	4,500	4,500	
<b>Subtotal Phase III</b>	<b>337,000</b>	<b>342,650</b>	<b>0</b>	<b>4,428</b>	<b>386,600</b>	<b>391,028</b>	
<b>Field Indirect Costs</b>							
Construction Management labor		108,360	10,725	140,886	83,000	223,886	
Construction Management field expenses		38,575	2,550	30,627	22,200	52,827	
Field office trailer		6,525	185	2,168	1,855	3,823	
CQA testing		9,200		0	17,100	17,100	
CQA completion report		5,000		0	5,000	5,000	
Survey and layout		2,208		0	2,200	2,200	
Material classification tests		1,500		5,782	2,500	8,262	
Consulting Engineer		42,200		30,950	25,100	56,050	
<b>Subtotal Consultants</b>	<b>164,500</b>	<b>213,588</b>	<b>13,440</b>	<b>210,392</b>	<b>168,755</b>	<b>369,147</b>	
<b>Hedra Costs</b>							
Labor	15,500	15,500	1,125	8,925	13,500	22,425	
Travel expenses	3,200	3,200		989	4,800	5,569	
<b>Subtotal Hedra Costs</b>	<b>18,700</b>	<b>18,700</b>	<b>1,125</b>	<b>9,914</b>	<b>18,300</b>	<b>27,994</b>	
<b>Total Pond 2 Final Closure</b>	<b>715,400</b>	<b>665,018</b>	<b>54,043</b>	<b>461,742</b>	<b>628,955</b>	<b>1,090,697</b>	

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**COPY**

March 7, 2005

**Sent via U.S. Mail**

Glenn Rogers, Chairman.  
Shivwits Band of Paiute Indian Tribe  
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Santa Clara, Utah 84765

John Krause  
Bureau of Indian Affairs Phoenix Area Office  
U.S. Department of Interior  
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Deborah Hamlin  
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RE: Progress report for February 2005 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Chairman Rogers, Mr. Krause and Ms. Hamlin:

Per paragraph 64 of the Order, enclosed is a copy of the February 2005 progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4135 or e-mail at [cgypton@hecla-mining.com](mailto:cgypton@hecla-mining.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Gypton".

Chris Gypton  
Project Manager

Encl

Cc: John Galbavy, Esq. (HMC) (w/o attachments)  
John Jacus, Esq. (DG&S) (w/o attachments)  
Eric Johnson (USEPA, Region VIII) (w/o attachments)